

**UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF MASSACHUSETTS**

John Hancock Life Insurance Company, *et al.*,

Plaintiffs,

V.

Abbott Laboratories,

Defendant.

C.A. No. 03-12501-DPW

**PLAINTIFFS' MOTION FOR
IMPOUNDMENT OF CONFIDENTIAL INFORMATION**

Pursuant to Local Rule 7.2, Plaintiffs John Hancock Life Insurance Company, John Hancock Variable Life Insurance Company, and Investors Partner Life Insurance Company (collectively, “John Hancock”) hereby move this Court for leave to file the following documents under Seal in connection with Plaintiffs’ Motion to Compel Defendant Abbott Laboratories to Produce Documents and Provide Substantive Responses to Certain Discovery Requests (“Motion to Compel”):

1. Exhibit G to Affidavit Of Raymond A. O'Brien In Support Of Plaintiffs' Motion To Compel; and
2. Exhibit M to Affidavit Of Raymond A. O'Brien In Support Of Plaintiffs' Motion To Compel.

The materials to be impounded contain confidential information of Abbott Laboratories (“Abbott”) and/or John Hancock and have been designated “Confidential” or “Highly Confidential” pursuant to the Stipulated Protective Order executed by the parties and entered by the Court in this matter on May 12, 2004 (“Stipulated Protective Order”).

John Hancock has consulted with Abbott pursuant to Local Rule 7.1(A)(2), and Abbott concurs that to the extent that the above-referenced documents are filed in connection with John Hancock's Motion to Compel, they should be filed in compliance with the provisions of the Stipulated Protective Order and Local Rule 7.2.

John Hancock respectfully requests that the Confidential Information that is the subject of this Motion be impounded until further Order of the Court.

Respectfully Submitted,

JOHN HANCOCK LIFE INSURANCE
COMPANY, JOHN HANCOCK VARIABLE LIFE
INSURANCE COMPANY, AND INVESTORS
PARTNER LIFE INSURANCE COMPANY,

By Their Attorneys,

/s/ Karen Collari Troake
Brian A. Davis (BBO No. 546462)
Michael Arthur Walsh (BBO No. 514875)
Karen Collari Troake (BBO No. 566922)
Raymond A. O'Brien (BBO No. 629753)
CHOATE, HALL & STEWART
Exchange Place
53 State Street
Boston, MA 02109-2891
(617) 248-5000

Dated: July 29, 2004

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1(A)(2)

The undersigned hereby certifies that counsel for John Hancock Life Insurance Company, John Hancock Variable Life Insurance Company, and Investors Partner Life Insurance Company has conferred with Abbott Laboratories' counsel and that Abbott Laboratories has no objection to impoundment of these materials, to the extent that they are filed in connection with Plaintiffs' Motion to Compel.

/s/ Karen Collari Troake
Karen Collari Troake